

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Mail Processing Network Rationalization
Service Changes, 2012

Docket No. N2012-1

AMERICAN POSTAL WORKERS UNION, AFL-CIO,
MOTION FOR ACCESS TO NON-PUBLIC INFORMATION
IDENTIFIED AS PRCWIT-LR-N2012-1/NP1-NP5
(June 20, 2012)

Pursuant to 39 CFR 3007.40 and Rule 21 of the Commission's Rules of Practice and Procedure, the American Postal Workers Union, AFL-CIO (APWU) hereby moves for access to the following library references sponsored by the PRC Consultants:

- PRCWIT-LR-N2012-1/NP1 Savings Evaluation, Final PIRs (Non-Public Version)
- PRCWIT-LR-N2012-1/NP2, Savings Evaluation, AMP Studies (Non-Public Version)
- PRCWIT-LR-N2012-1/NP3, Savings Evaluation, Outgoing Secondary (Non-Public Version)
- PRCWIT-LR-N2012-1/NP4, Service Standard Evaluation (Non-Public Version)
- PRCWIT-LR-N2012-1/NP5, Savings Evaluation (Non-Public Version)

The PRC Consultants submitted Library References PRCWIT-LR-N2012-1/NP1 through PRCWIT-LR-N2012-1/NP5 on April 24, 2012. The Commission Consultants' Notice of Filing states the "non-public library references contain data extracted from Postal Service library references for which the Postal Service has requested nonpublic status. No additional applications for non-public status are being filed."

APWU is an active participant in this case. We have fully participated in discovery on the Postal Service's direct case and have filed the rebuttal testimony of three witnesses. APWU representatives, attorneys and consultants have been granted access to all non-public library references filed by the Postal Service in this case to date. Therefore, APWU respectfully requests access to PRCWIT-LR-N2012-1/NP1, NP2, NP3, NP4 and NP5. APWU believes that the information contained in these library references will inform our review of this case, as well as our arguments on brief.

In accordance with 39 CFR 3007.40(b), APWU representatives, consultants and attorneys have completed a Statement of Compliance with Protective Conditions Certification, found in Appendix A to Part 3007 of Title 39 of the Code of Federal Regulations, for Library References PRCWIT-LR-N2012-1/NP1, NP2, NP3, NP4 and NP5 as follows:

Phillip A. Tabbita,
Manager, Negotiation Support and Special Projects
American Postal Workers Union, AFL-CIO

Kathryn Kobe,
Director of Price, Wage and Productivity Analysis ECS, LLC
Economic Consultant for American Postal Workers Union, AFL-CIO

Darryl J. Anderson, Esq.
O'Donnell, Schwartz & Anderson, PC
Counsel for the American Postal Workers Union, AFL-CIO

Jennifer L. Wood, Esq.
O'Donnell, Schwartz & Anderson, PC
Counsel for the American Postal Workers Union, AFL-CIO

Barbara Zibordi
Paralegal
O'Donnell, Schwartz & Anderson, PC

A copy of each Certification is attached hereto. The original Certifications will be promptly filed with the Commission. Persons identified by the Postal Service pursuant to Section 3007.2(c) have also been provided with a copy of this Motion and accompanying certifications today by email.

Counsel for APWU has conferred with counsel for the PRC Consultants and has

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been told that there is no objection to the above named individuals accessing the materials contained in PRCWIT-LR-N2012-1/NP1, NP2, NP3, NP4 and NP5.

Furthermore, the above named individuals have previously been granted access to all Postal Service library references filed in the non-public annex of this docket. Therefore, APWU requests that the Commission waive the normal three-day waiting period required to allow for objections and grant immediate access to these Library References by the above named individuals.

Conclusion

For the forgoing reasons, APWU respectfully requests that access to Library References PRCWIT-LR-N2012-1/NP1, NP2, NP3, NP4 and NP5 be immediately granted to the above named individuals.


Respectfully submitted,

Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as **PRCWIT-LR-N2012-1/NP1** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name	<u>Phillip Tabbita</u>
Firm	<u>American Postal Workers Union, AFL-CIO</u>
Title	<u>Manager Negotiation Support and Special Projects</u>
Representing	<u>American Postal Workers Union, AFL-CIO</u>
Signature	<u></u>
Date	<u>June 19, 2012</u>

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Name	<u>Kathryn Kobe</u>
Firm	<u>ECS, LLC</u>
Title	<u>Director of Price, Cost & Productivity Analysis</u>
Representing	<u>APWU</u>
Signature	<u>Kathryn Z Kobe</u>
Date	<u>June 19, 2012</u>

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The undersigned represents that:

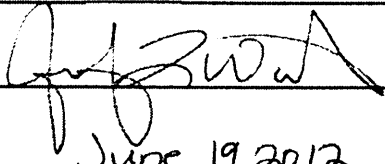
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Name	Darryl Anderson
Firm	O'Donnell, Schwartz & Anderson, P.C.
Title	Attorney
Representing	APWU
Signature	
Date	June 20, 2012

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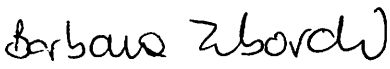
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Name	<u>Jennifer L. Wood</u>
Firm	<u>O'Donnell, Schwartz & Anderson, P.C.</u>
Title	<u>Attorney</u>
Representing	<u>APWU</u>
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Name	Barbara Zibordi
Firm	O'Donnell, Schwartz & Anderson, P.C.
Title	Paralegal
Representing	APWU
Signature	
Date	June 20, 2012

CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as **PRCWIT-LR-N2012-1/NP2** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name	<u>Phillip Tabbita</u>
Firm	<u>American Postal Workers Union, AFL-CIO</u>
Title	<u>Manager Negotiation Support and Special Projects</u>
Representing	<u>American Postal Workers Union, AFL-CIO</u>
Signature	<u></u>
Date	<u>June 19, 2012</u>

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Name	<u>Kathryn Kobe</u>
Firm	<u>ECS, LLC</u>
Title	<u>Director of Price, Cost & Productivity Analysis</u>
Representing	<u>APWU</u>
Signature	<u>Kathryn L Kobe</u>
Date	<u>June 19, 2012</u>

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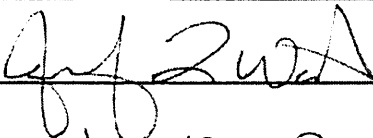
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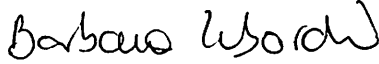
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Name	<u>Jennifer L. Wood</u>
Firm	<u>O'Donnell, Schwartz & Anderson, P.C.</u>
Title	<u>Attorney</u>
Representing	<u>APWU</u>
Signature	<u></u>
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Name	Barbara Zibordi
Firm	O'Donnell, Schwartz & Anderson, P.C.
Title	Paralegal
Representing	APWU
Signature	
Date	June 20, 2012

CERTIFICATION

The undersigned represents that:

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Firm	<u>American Postal Workers Union, AFL-CIO</u>
Title	<u>Manager Negotiation Support and Special Projects</u>
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Signature	<u></u>
Date	<u>June 19, 2012</u>

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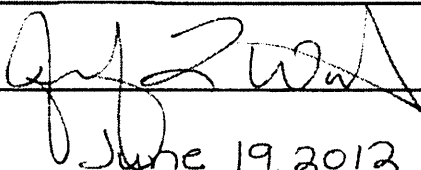
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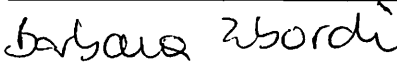
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Representing	<u>American Postal Workers Union, AFL-CIO</u>
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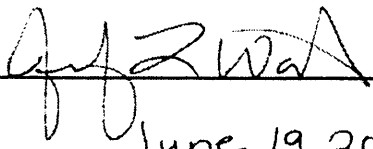
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Firm	<u>O'Donnell, Schwartz & Anderson, P.C.</u>
Title	<u>Attorney</u>
Representing	<u>APWU</u>
Signature	<u></u>
Date	<u>June 19, 2012</u>

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Date	<u>6/19/2017</u>

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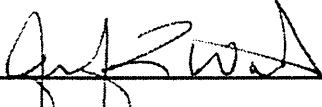
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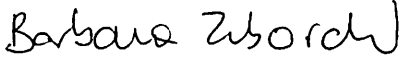
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